

**EOSR staff report  
for**

***Item 9  
Discussion***

***April 10, 2002***

**U.S. Navy, Naval Base Point Loma  
tentative Order No. R9-2002-0002  
NPDES Permit No. CA0109363**

The U.S. Navy installations in the San Diego area fall under the *U.S. Navy, Commander, Navy Region Southwest* (CNRSW) command structure and are aligned into three (3) major complexes:

- *Naval Base Point Loma,*
- *Naval Base Coronado, and*
- *Naval Base San Diego.*

A separate NPDES Permit will be developed for each complex. Tentative Order No. R9-2002-0002 will regulate the discharges from the installations included as part of the *Naval Base Point Loma* (NBPL) Complex. The NBPL Complex includes the Navy installations listed below.

- Naval Submarine Base, San Diego (SUBASE)
- Magnetic Silencing Facility (MSF)
- Fleet Anti-Submarine Warfare Training Center, Pacific (FASW)
- Navy Public Works Center, Taylor Street Facility (PWC TSF)
- Space and Naval Warfare Systems Center, San Diego, Point Loma Campus (SSC San Diego PLC)
- Space and Naval Warfare Systems Center, Old Town Campus (SSC San Diego OTC)
- Fleet Combat Training Center, Pacific (FCTCPAC)
- Fleet and Industrial Supply Center (FISC) Pt. Loma

Except for FASW, PWC TSF, and SSC San Diego OTC, NBPL installations are located along the eastern shore, western shore, and the interior areas of the Point Loma Peninsula at the entrance to San Diego Bay.

### **Point Source**

The *point source* discharges as identified in the report of waste discharge (RWD) are grouped into ten general industrial processes:

- Utility Vault & Manhole Dewatering;
- Steam Condensate;
- Diesel Engine Cooling Water;
- The floating drydock, the ARCO, Ballast Tanks;
- MSF Pier Washing;
- Dolphin Pools
- Unused San Diego Bay Water;
- Abalone Tanks & Bioassay Trailer Discharges;
- Pier Boom Cleaning; and
- Miscellaneous Discharges (landscape watering runoff, potable water & fire system maintenance).

An additional waste discharge included and prohibited in tentative Order No. R9-2002-0002 are discharges associated with:

- Ship repair and maintenance activities.

The additional discharge is based on the information contained in the Regional Board's administrative records.

Descriptions of the point source discharges are included in the Fact Sheet for the tentative Order. The point source discharges are intermittent or low volume with a low potential threat to water quality. The tentative Order requires monitoring to ensure that the potential threat to water quality is low.

### **Industrial Storm Water**

Industrial storm water discharges occur at 5 of the 8 *Installations* at the NBPL. The installations are listed below.

- Naval Submarine Base, San Diego (SUBASE);
- Magnetic Silencing Facility (MSF);
- Space and Naval Warfare Systems Center, San Diego, Point Loma Campus (SSC San Diego, PLC);

- Space and Naval Warfare Systems Center, Old Town Campus (SSC San Diego, OTC); and
- Fleet and Industrial Supply Center (FISC) Pt. Loma.

A summary of the industrial activities; a brief description of the Navy's storm water group; a discussion of the USEPA Multi-Sector permit; and a description of certain storm water monitoring analysis data is provided in the Fact Sheet.

The industrial storm water discharges from the SUBASE have significant levels of copper and zinc.

- The tentative Order requires an immediate evaluation of the industrial storm water discharge from the SUBASE. The concentrations of copper and zinc will need to be significantly reduced within 2 years of the adoption of the tentative Order.
- The tentative Order requires the industrial storm water discharges from the SUBASE to comply with toxicity specifications within 2 years of the adoption of the tentative Order.
- The tentative Order requires additional monitoring of the industrial storm water discharges if the concentrations of copper exceed 63 µg/L or if the zinc concentrations exceed 117 µg/L.

### **Radiation**

Comments regarding the discharges of radioactive wastes were received. In response, the errata sheet includes a Finding that clarifies the Regional Board jurisdiction regarding radioactive wastes. Pursuant to the *Atomic Energy Act*, the Regional Board does not have jurisdictional authority to regulate the discharges of radioactive wastes. Therefore, this Order does not regulate discharges of radioactive wastes from nuclear submarine propulsion plants or from nuclear support facilities.

### **Comment letters and errata sheet**

As of March 28, 2002, the only written comments received on this item were 2 letters from Ms. Laura Hunter of the Environmental Health Coalition (EHC) recommending various changes in the

tentative Order. Copies of the EHC letters are included in the agenda package.

A response to the, EHC letter dated March 14, 2002 was prepared and mailed on March 28, 2002.

A response to the EHC letter dated March 27, 2002, will be prepared and included in the 2<sup>nd</sup> mailing.

In response to the comments from EHC, minor changes were developed and are included as an errata sheet to the tentative Order. The changes included amendments to the Findings, additional Discharge Specifications, Provisions, and additional monitoring requirements. The changes to the Discharges Specifications and the Provisions included toxicity requirements and an earlier submittal date for a *systems engineering analysis report* regarding the industrial storm water discharges from the SUBASE. The added monitoring requirements included acute toxicity monitoring.

The errata sheet also modifies the tentative Order by including sections of the *General Industrial Storm Water Permit* and sections of the *General Utility Vault Permit*. Previously, the two General Permits were incorporated into the tentative Order by reference. With the errata sheet modifications the tentative Order will include the relevant sections of the two General Permits as an attachment and the waste discharge requirements provided by the two General Permits will be terminated.